

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

UNITED STATES OF AMERICA,
Plaintiff,

V.

0.1785 ACRES OF LAND, MORE OR LESS, SITUATE IN CHESAPEAKE VIRGINIA, AND MSF INVESTORS II, LLC, ET AL.,

Defendants.

Civil Case No. 2:24-cv-00023-AWA-DEM

NOTICE OF DISCLAIMER OF INTEREST BY
DEFENDANT DEEP CREEK COMICS, LLC

Plaintiff United States of America hereby provides notice to all parties and their attorneys of record of the attached Disclaimer of Interest executed by Defendant Deep Creek Comics, LLC. The fully executed Disclaimer of Interest is attached as Exhibit A.

DATED: September 22, 2025

MARY M. CLEARY
ACTING UNITED STATES
ATTORNEY

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Respectfully submitted,

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ACTING ASSISTANT ATTORNEY GENERAL
ENVIRONMENT AND NATURAL
RESOURCES DIVISION

/s/ Scott W. Stemetzki

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Attorneys for Plaintiff United States of America

CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2025, I electronically filed the foregoing document using the CM/ECF System, which constituted service on all parties in this case.

I further certify that the foregoing document will be mailed to the following parties within one business day of filing:

| | |
|---|---|
| City of Chesapeake, Virginia City Attorney for the City of Chesapeake, Virginia 306 Cedar Road Chesapeake, VA 23322 | H Huynh LLC, <i>a Virginia limited liability company</i> c/o Huy Huynh, Registered Agent 2617 Moses Grandy Trail, Suite 106 Chesapeake, VA 23323 |
| Bank of America, National Association c/o CT Corporation System, Registered Agent 4701 Cox Road Suite 285 Glen Allen, VA 23060 | LOJ Corporation, <i>a Virginia corporation</i> c/o Kyoung H. Lee, Registered Agent 2617 Moses Grandy Trail, Suite 108 Chesapeake, VA 23323 |
| Protective Life Insurance Company, <i>a Tennessee Corporation</i> c/o CT Corporation System, Registered Agent 4701 Cox Road Suite 285 Glen Allen, VA 23060 | Mohamed Arfaoui 2617 Moses Grandy Trail, Suite 110 Chesapeake, VA 23323 |
| B. Randolph Boyd, <i>in his capacity as Trustee of the Credit Line Deed of Trust and Security Agreement dated October 27, 1997</i> 4343 Kimages Wharf Road Charles City, VA 23030 | Deep Creek Pizza LLC, <i>a Virginia limited liability company</i> c/o Kristen Jurjevich, Registered Agent Pender & Coward, P.C. 222 Central Park Avenue, Suite 400 Virginia Beach, VA 23462 |
| Chang Tao Lin, Inc., <i>a Virginia corporation</i> c/o Chang Tao Lin, Registered Agent 816 S. Rosemont Road Virginia Beach, VA 23452 | Dolgen, LLC, <i>a Kentucky limited liability company</i> c/o Corporation Service Company, Registered Agent 100 Shockoe Slip Fl 2 Richmond, VA 23219 |
| Deep Creek Comics, LLC, <i>a Virginia limited liability company</i> c/o Jeffrey Smithwick, Registered Agent 241 Palace Green Blvd Virginia Beach, VA 23452 | Samantha Rudolph Photography LLC, <i>a Virginia limited liability company</i> c/o Samantha Rudolph, Registered Agent 2617 Moses Grandy Trail, Suite 120 Chesapeake, VA 23323 |
| Golden China Lee Inc., <i>a Virginia corporation</i> c/o Xin Hai Li, Registered Agent | El Puente II of Chesapeake, Inc., <i>a Virginia corporation</i> c/o Ricardo Perez, Registered Agent |

| | |
|---|--|
| 2617 Moses Grandy Trail, Suite 104 Chesapeake, VA 23323 | 104 Watch Harbour Court Suffolk, VA 23435 |
| Waffle House, Inc., <i>a Georgia corporation</i> c/o Corporation Service Company, Registered Agent 100 Shockoe Slip Fl 2 Richmond, VA 23219 | Howard P. Cobb, D.D.S., P.C., <i>a Virginia professional corporation</i> c/o Christopher Graff, Registered Agent 4912 Athens Boulevard Virginia Beach, VA 23455 |
| Lynch Family LLC, <i>a Virginia limited liability company</i> c/o John C. Lynch, Registered Agent 222 Central Park Avenue, Suite 2000 Virginia Beach, VA 23462 | Deacon Insurance Agency, Inc., <i>a Virginia corporation</i> c/o William Stewart Deacon III, Registered Agent 2605 Moses Grandy Trail, Suite A Chesapeake, VA 23323 |
| Advance Auto Parts, Inc., <i>a Delaware corporation</i> c/o Corporation Service Company, Registered Agent 100 Shockoe Slip Fl 2 Richmond, VA 23219 | Boddie-Noell Enterprises, Inc., <i>a North Carolina corporation</i> (as successor-by-merger to BNE Restaurant Group II LLC) c/o CT Corporation System, Registered Agent 4701 Cox Road Suite 285 Glen Allen, VA 23060 |
| Mark E. Shaffer Greenberg Traurig, LLP 1750 Tysons Boulevard, Suite 1000 McLean, VA 22102 <i>Attorney for Defendant Starbucks Corp.</i> | Samantha Rudolph Photography LLC c/o Samantha Rudolph, Registered Agent 609 Ringtail Court Chesapeake, VA 23323 |

DATED: September 22, 2025

/s/ Scott W. Stemetzki

Scott W. Stemetzki

Attorney, U.S. Department of Justice